



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460
TOXIC SUBSTANCES CONTROL ACT
TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			4. FACILITY NAME
DATE 2/17/17	INSPECTION NO. F18705	DAILY SEQ. NO. 01	Mays Ochoa
2. INSPECTOR'S NAME James M Bean			5. ADDRESS West Gate Industrial Park 2nd St #515 BO Palmas Cataño PR
3. INSPECTOR'S ADDRESS 2890 Woodbridge Ave Edison NJ 08837			6. NAME OF CHIEF EXECUTIVE OFFICER Sarah Viruet
			7. TITLE VPE General Manager

For internal EPA use. Copies may be provided to recipient as acknowledgment of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

Any or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE
I acknowledge receipt of this notice:

If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.

SIGNATURE 	NAME	
NAME Juan C Bernazar	TITLE	
TITLE Quality Assurance Coordinator	DATE SIGNED 17 FEB 17	ADDRESS



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection
Office of Enforcement and Compliance Assurance

1. Investigation Identification			3. Facility Name
Date <i>2/17/17</i>	Inspection Number <i>F18705</i>	Daily Seq. Number <i>01</i>	<i>Mays Ochoa</i>
2. Inspector's Address <i>2890 Woodbridge Ave Edison NJ 00837</i>			4. Facility Address <i>West Gate Industrial Park #515 Bo Palmas 2nd ST Santa Catalina PR 00962</i>

For Internal EPA Use. Copies may be provided to the recipient as acknowledgment of this notice.

Reason for Inspection

Under the authority of Section 11 of the Toxic Substances Control Act

For the purpose of inspecting (including taking samples, photographs, statements and other inspection activities) an establishment, facility or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, ☒ processes, control and facilities) and any conveyances being used to transport chemical substance, mixtures or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures or articles, within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial Data

☐ D. Personnel Data

☐ B. Sales Data

☐ E. Research Data

☐ C. Pricing Data

The nature and extent of inspection of such data specified in A through E above is as follows:

Inspector's Signature <i>[Signature]</i>		Recipient's Signature <i>[Signature]</i>	
Name <i>James M Bean</i>		Name <i>Juan C Bernazar</i>	
Title <i>Inspector</i>	Date <i>2/17/17</i>	Title <i>QA Coordinator</i>	Date <i>17 FEB 17</i>



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act
RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 2/17/17	Inspector No. F18705	Daily Seq. No. 01	Mays Ochoa
3. Inspector Address 2890 Woodbridge Ave Edison NJ 00837			4. Firm Address West Gate Industrial Park 2nd St #515 Bo Palmas Caguas PR 00962

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
021717187050101	Hard copy response to inspection. Five pages single sided. Non CBI.
[Large diagonal line across the table with handwritten "210" in the center]	

Optional:

Duplicate or split samples: Requested and Provided ☐ Not Requested ☒

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature 		Recipient Signature 	
Name James M. Bean		Name Juan C Bernatar	
Title Inspector	Date Signed 2/17/17	Title Quality Assurance Coordinator	Date Signed 17 FEB 17



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

DECLARATION OF CONFIDENTIAL BUSINESS INFORMATION

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 2/17/17	INSPECTOR NO. F18018705	DAILY SEQ. NO. 01	Mays Ochoa
3. INSPECTOR ADDRESS 2890 Woodbridge Ave Edison NJ 00837			4. FIRM ADDRESS West Gate Industrial Park 2nd st #515 BO Palmas Caguas PR 00962

INFORMATION DESIGNATED AS CONFIDENTIAL BUSINESS INFORMATION

NO.	DESCRIPTION
	<p><i>No CBI submitted</i></p>

ACKNOWLEDGEMENT BY CLAIMANT

The undersigned acknowledges that the information described above is designated as Confidential Business Information under Section 14(c) of the Toxic Substances Control Act. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned understands that challenges to confidentiality claims may be made, and that claims are not likely to be upheld unless the information meets the following guidelines: (1) The company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures; (2) The information is not, and has not been reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

INSPECTOR SIGNATURE 		CLAIMANT SIGNATURE 	
NAME James M. Bean		NAME Juan C. Bernazar	
TITLE Inspector	DATE SIGNED 2/17/17	TITLE Quality Assurance Coordinator	DATE SIGNED 17 FEB 17